

UNITED STATES BANKRUPTCY COURT  
DISTRICT OF NEW JERSEY

**Caption in Compliance with D.N.J. LBR 9004-1(b)**

GOODMAN LAW OFFICE LLC  
By: Ellen M. Goodman, Esq.  
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Attorneys for Creditor, Harmon Cove Towers I  
Condominium Association, Inc.

In Re:

Patricia Wright,  
Debtor.

Case No.: 24-19154 (JKS)

Chapter: 13

Judge: John K. Sherwood

**CREDITOR, HARMON COVE TOWERS I CONDOMINIUM ASSOCIATION, INC.'S  
OBJECTION TO CONFIRMATION OF DEBTOR'S CHAPTER 13 PLAN PURSUANT  
TO LOCAL RULE 3015-3, 11 U.S.C. §§1322, 1324 AND 1325**

Creditor, Harmon Cove Towers I Condominium Association, Inc., by and through its attorneys Goodman Law Office LLC for its objection to the Debtor's proposed Chapter 13 Plan respectfully objects as follows:

1. Harmon Cove Towers I Condominium Association, Inc. (the "Association") is a secured creditor due to the various liens filed against 207 Harmon Cove Tower, Secaucus, New Jersey 07094 (the "Unit") and pursuant to the New Jersey Condominium Act N.J.S.A. 46:8B-1 et seq.

2. The Debtor's proposed Chapter 13 Plan understates the amount of the funds owed to the Association pursuant to her ownership of the Unit.

3. Pursuant to the Proof of Claim (Claim #3), filed on or about October 5, 2024, the Debtor owes the Association \$50,200.13.

4. The Debtor's Plan only stated that \$33,764.44 was owed to the Association.
5. The Association has also not received any post-petition payments as required.
6. The Debtor's proposed plan is unfeasible.

Wherefore, Creditor, Harmon Cove Towers I Condominium Association, Inc. submits that for the reasons stated, confirmation of the Debtor's Chapter 13 plan must be denied.

**GOODMAN LAW OFFICE LLC**  
*Attorneys for Creditor Harmon Cove  
Towers I Condominium Association, Inc.*

By: */s/ Ellen M. Goodman*  
ELLEN M. GOODMAN

DATED: December 4, 2024